

**United States Bankruptcy Court for the  
Southern District of Ohio, Western Division  
Cincinnati Divisional Office**

IN RE:

Sean Patrick Dennedy

Case No. 11-16984  
Judge: Beth A. Buchanan  
Chapter: 13

Debtor(s) \_\_\_\_\_ /

**MOTION FOR PAYMENT OF UNCLAIMED FUNDS**

Under penalty of perjury, the Movant declares that the following statements and information are true and correct.

1. To the best of Movant's knowledge, a check in the amount of \$440.10 was issued to PNC Bank (name of original creditor/claimant).
2. To the best of Movant's knowledge, the funds were tendered by the case trustee to the Bankruptcy Clerk and then to the United States Treasury.
3. The Movant's current address, phone number and social security number (last 4 digits only of social security number or complete EIN) are as follows:

35308 SE Center St, Snoqualmie, WA 98065  
425-836-5728  
74-3049851

4. The Movant did not receive the check or did not negotiate the check for the following reason(s):

Dilks & Knopik, LLC has purchased and has been assigned the unclaimed dividend relating to Claim Number 2 from PNC Bank, National Association in the above referenced case as evidence by the Purchase Agreement & General Assignment labeled exhibit A. (Schedule 1, Page 1, Line 7).

The original dividend check was sent to a PNC Bank at PO BOX 94982, CLEVELAND, OHIO 44101. That address is no longer valid. The current address is listed above. The change in mailing address may have prevented delivery of the original dividend check.

5. Movant represents that he/she is the owner of the funds, or is a legal representative of the owner, and is entitled to receive the funds. (If the movant is other than the owner of the funds, additional requirements pursuant to Local Bankruptcy Rule 3011-1(d) may apply to establish the right of payment of the unclaimed funds.)
6. Movant understands that pursuant to 18 U.S.C. § 152, a fine or imprisonment or both may be imposed if he/she knowingly or fraudulently made any false statements in this document.
7. Wherefore, Movant requests an order directing the Clerk to pay the funds to Dilks & Knopik, LLC as assignee to PNC Bank, National Association, and mail said check to the following address: 35308 SE Center St, Snoqualmie, WA 98065.

Respectfully Submitted:

Dated: November 25, 2014

/s/Brian J. Dilks  
Managing Member  
Dilks & Knopik, LLC as assignee to  
PNC Bank, National Association  
35308 SE Center St, Snoqualmie, WA 98065  
Brian.dilks@dilksknopik.com

**AFFIDAVIT OF FUNDS LOCATOR**

I, Brian J. Dilks, have obtained the consent of the claimant to make application for the unclaimed funds as provided in this application. I have made all reasonable efforts required to believe to the best of my knowledge that Dilks & Knopik, LLC as assignee to PNC Bank, National Association is legally entitled to the unclaimed funds referenced in this application.

Dated November 25, 2014

/s/Brian J. Dilks  
Managing Member  
Dilks & Knopik, LLC  
As assignee to PNC Bank, National Association  
35308 SE Center St  
Snoqualmie, WA 98065  
Brian.dilks@dilksknopik.com

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**CERTIFICATE OF SERVICE OF APPLICATION**

I hereby certify that a copy of the foregoing Motion for Payment of Unclaimed Funds was served on the following by ordinary U.S. Mail on November 25, 2014

U.S. Attorney's Office  
Southern District of Ohio  
303 Marconi Boulevard – Suite 200  
Columbus, OH 43215

Office of the US Trustee  
36 East Seventh Street, Suite 2030  
Cincinnati, Ohio 45202

Sean Patrick Dennedy  
Debtor  
1640 Winchester Avenue  
Cincinnati, OH 45230

A copy of the foregoing Motion for Payment of Unclaimed Funds was served on the following via Electronic Mail on November 25, 2014

Margaret A Burks  
Trustee  
Cincinnati@cinn13.org

Nicholas A Zingarelli  
Debtors Attorney  
nick@zingarellilaw.com

Dated: November 25, 2014

/s/Brian J. Dilks  
Managing Member  
Dilks & Knopik, LLC  
As assignee to  
PNC Bank, National Association  
35308 SE Center St  
Snoqualmie, WA 98065  
Brian.dilks@dilksknopik.com

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Debtor(s) \_\_\_\_\_ / \_\_\_\_\_

**NOTICE OF MOTION**

Dilks & Knopik, LLC has filed a Motion for Payment of Unclaimed Funds with the court.

**Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one. If you do not want the court to grant the relief sought in the motion/objection, then on or before **twenty-one (21) days from the date set forth in the certificate of service for the motion/objection**, you must file with the court a response explaining your position by mailing your response by regular US Mail to the bankruptcy court clerk's office OR your attorney must file a response using the court's ECF system.

The court must **receive** your response on or before the above date. You must also send a copy of your response either by 1) the court's ECF System or by 2) regular U.S. Mail to

U.S. Attorney's Office  
Southern District of Ohio  
303 Marconi Boulevard – Suite 200  
Columbus, OH 43215

Office of the US Trustee  
36 East Seventh Street, Suite 2030  
Cincinnati, Ohio 45202

Sean Patrick Dennedy  
Debtor  
1640 Winchester Avenue  
Cincinnati, OH 45230

Nicholas A Zingarelli  
Debtors Attorney  
nick@zingarellilaw.com

Margaret A Burks  
Trustee  
Cincinnati@cinn13.org

Dilks & Knopik, LLC  
35308 SE Center Street  
Snoqualmie, WA 98065

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion/objection and may enter an order granting that relief without further hearing or notice.

Dated: November 25, 2014

/s/Brian J. Dilks  
Managing Member  
Dilks & Knopik, LLC  
As assignee to  
PNC Bank, National Association  
35308 SE Center St  
Snoqualmie, WA 98065  
Brian.dilks@dilksknopik.com



### Statement of Authority

The undersigned being duly sworn, states that the below listed individuals are authorized to execute all claim documents on behalf of Dilks & Knopik, LLC, and its subsidiaries, as required for any and all claim(s) submitted for Unclaimed, Lost or Abandoned Property on the Company's behalf.

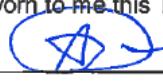
#### Brian J Dilks –President – Managing Member

Dilks & Knopik, LLC

  
Caryn M Dilks  
Managing Member  
35308 SE Center Street  
Snoqualmie, WA 98065  
425-836-5728 x101



Subscribed and sworn to me this Thursday, September 18, 2014

Notary Signature 

Printed Name: Andrew T. Drake

My Commision Expires: August 9, 2015



35308 SE Center Street  
Snoqualmie, WA 98065

Phone 877-836-5728  
Fax «systemuser\_address1\_fax»  
Email admin@dilksknopik.com



Dilks & Knopik

When Success Matters

**Brian Dilks**

Managing Member

35308 SE Center Street

Snoqualmie, WA 98065

Ph. 877-836-5728 x 101

Fx. 877-209-8249

brian.dilks@dilksknopik.com

[www.dilksknopik.com](http://www.dilksknopik.com)